

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

JANE DOE,

Plaintiff,

v.

CASE NO: 1:25-cv-20757-JB/Torres

STEVEN K. BONNELL II,

Defendant.

PLAINTIFF'S MOTION FOR LEAVE TO FILE
PROPOSED ORDER UNDER SEAL

Pursuant to Local Rule 5.4(b)(1) of the Southern District of Florida, Plaintiff Jane Doe ("Plaintiff"), by and through her undersigned counsel, respectfully moves this Court for leave to file under seal Exhibit A in support of her Notice of Local Rule 7.1(b)(4) Expiration and Supplemental Evidence in Further Support of Motion for Protective Order Governing Public Commentary (ECF 159). In support of this good cause motion, Plaintiff states as follows:

1. On this same date, Plaintiff has filed a Notice of Local Rule 7.1(b)(4) Expiration and Supplemental Evidence in Further Support of Motion for Protective Order Governing Public Commentary ("Notice") (ECF 159). The Notice refers to and relies on a social media post and two of the replies to that post, which are incorporated together in Exhibit A. These social media posts contain identifying information of Plaintiff and her spouse.

2. The Court's Protective Order (ECF 7) provides that "[a]ll documents filed with the Court that contain the name of Plaintiff or information that identifies Plaintiff or her family members, directly or indirectly, shall be filed under seal." Accordingly, and in compliance with the Court's Order, Plaintiff hereby moves for leave to file Exhibit A under seal. Plaintiff requests

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that the seal remain in place for the duration of the litigation, including any appeals, to ensure ongoing protection.

WHEREFORE, Plaintiff respectfully requests that the Court grant leave to file Exhibit A to the Notice (ECF 159) under seal, and enter an order directing the Clerk to maintain these documents under seal.

Dated: October 30, 2025.

Respectfully submitted,

JSP LAW, LLC
Joan Schlump Peters
(admitted *pro hac vice*)
838 Neapolitan Way, #91
Naples, FL 34103
Tel. 305-299-4759
Email: petersjoan@bellsouth.net
Counsel for Plaintiff JANE DOE

**SANCHEZ-MEDINA GONZALEZ
LAGE GOMEZ & MACHADO, LLP**
CARLOS A. GARCIA PEREZ / Fla Bar 106895
GUSTAVO D. LAGE / Fla Bar 972551
201 Alhambra Circle, Suite 1205
Coral Gables, Florida, 33134
Tel. (305) 377-1000
Primary E-Mail: cgarciaperez@smgqlaw.com
Primary E-Mail: glage@smgqlaw.com
Counsels for Plaintiff JANE DOE



By: _____
CARLOS A. GARCIA PEREZ

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 30, 2025 a true and correct copy of the foregoing was served on all parties via the CM/ECF filing portal to all counsel of record.



By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff